

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

THE STATE OF ILLINOIS, ex rel.,
KWAME RAOUL, ATTORNEY GENERAL.,

Plaintiff,

v.

ELI LILLY AND COMPANY, *et al.*

Defendants.

Civil Action No. 1:23cv170

ORAL ARGUMENT REQUESTED

**UNITEDHEALTH GROUP INCORPORATED AND OPTUMINSIGHT, INC.’S
RULE 12(b)(2) MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Defendants UnitedHealth Group Incorporated and OptumInsight, Inc. respectfully move the Court under Federal Rule of Civil Procedure 12(b)(2) for an order dismissing the Complaint with prejudice for lack of personal jurisdiction. In support of this motion, Defendants state as follows:

1. The State’s Complaint should be dismissed pursuant to Fed. R. Civ. P. 12(b)(2) because this Court lacks personal jurisdiction over UHG and OptumInsight.
2. There is no general jurisdiction over UHG or OptumInsight because neither company is at home in Illinois (and there is otherwise no basis for general jurisdiction).
3. There is no specific jurisdiction over either UHG or OptumInsight because there are no factual allegations establishing that either company has suit-related contacts with Illinois creating a substantial connection with the State such that exercising jurisdiction over them would comport with the Due Process Clause of the Fourteenth Amendment.

Dated: March 6, 2023.

**UNITEDHEALTH GROUP INCORPORATED
AND OPTUMINSIGHT, INC.**

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CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Patricia Brown Holmes
Patricia Brown Holmes